

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CLAUDIA SIMS

VS.

SUSAN SOUDERS AND
WERNER ENTERPRISES, INC.

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CIVIL NO. 1:20-cv-01229

DEFENDANTS, WERNER ENTERPRISES, INC., AND SUSAN SOUDERS
NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS:


Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendants, **WERNER ENTERPRISES, INC., and SUSAN SOUDERS**, hereby removes this action to the United States District Court for the Western District of Texas Austin Division from the 201ST Judicial District Court of Travis County, Texas, stating as follows:

1. Plaintiff, Claudia Sims commenced this action in the 201st Judicial District Court of Travis County, Texas, where it was given Cause No. D-1-GN-20-006934. This action is between citizens of different states. Plaintiff is a resident of Texas. Defendant, Werner Enterprises, Inc. is a Nebraska corporation with a principal place of business in Omaha, Nebraska. Plaintiff and Defendants are citizens of different states, none of the Defendant(s) are citizens of Texas, and the proper parties are totally diverse from Plaintiff.
2. Defendant, Werner Enterprises, Inc., received the summons and complaint on November 25, 2020, by way of its registered Agent.
3. Defendant, Susan Souders received the summons and complaint on November 30, 2020 and is a resident of Chillicothe, Ohio.
4. A copy of all process, pleadings, and orders served upon Defendants, are attached as Exhibit A.

5. Defendants will provide written notice of this Notice of Removal to all adverse parties and will file a copy with the Clerk of the 201st Judicial District Court of Travis County, Texas.

Dated: **December** 17th, 2020

Respectfully submitted,


LARRY D. WARREN
ATTORNEY IN CHARGE
State Bar No. 20888450
FBN: 13339
ATTORNEY FOR DEFENDANTS

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of **December 2020**, the foregoing document, was filed with the Clerk of Court using the CM/ECF system, and was served on counsel via **E-mail**:

Jan-Georg Roesch
SBN: SBN: 24103523
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LARRY D. WARREN